

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

BIG LOTS, INC., *et al.*,

Debtors.<sup>1</sup>

Chapter 11

Case No. 24-11967 (JKS)

(Jointly Administered)

**RE: D.I. 436**

**CERTIFICATION OF COUNSEL FOR STIPULATION REGARDING  
MOTION OF DELL FINANCIAL SERVICES L.L.C. FOR RELIEF  
FROM AUTOMATIC STAY PURSUANT TO  
11 U.S.C. § 362(d), OR IN THE ALTERNATIVE,  
FOR ADEQUATE PROTECTION PAYMENTS**

The undersigned counsel to the above-captioned debtors and debtors in possession (the “**Debtors**”) hereby certify as follows:

1. On October 7, 2024, in response to the Interim Order, Dell Financial Services, L.L.C. (“**DFS**”) filed the *Motion of Dell Financial Services L.L.C. for Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362(d), or in the Alternative, for Adequate Protection Payments* (D.I. 436) (the “**Motion**”).<sup>2</sup>

2. To resolve the Motion, counsel for the Debtors and DFS have agreed to a stipulation (the “**Stipulation**”) to confirm their mutual understanding and agreement with respect to the affected DFS Equipment

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<sup>1</sup> The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores - PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores - CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The address of the debtors’ corporate headquarters is 4900 E. Dublin-Granville Road, Columbus, OH 43081.

<sup>2</sup> Capitalized terms not defined herein have the terms ascribed to them in the Motion.

3. A copy of the Stipulation is attached as Exhibit 1 to the proposed form of order (the “**Proposed Order**”), attached hereto as **Exhibit A**.

4. Counsel for the Debtors and DFS have reviewed the Proposed Order and have agreed to its entry.

WHEREFORE, the Debtors respectfully request that the Court enter the Proposed Order, substantially in the form attached hereto as **Exhibit A**, at its earliest convenience.

*[Signature page follows]*

Dated: November 12, 2024  
Wilmington, Delaware

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